

Lesson 3: Authorizing Official (AO) Responsibilities

LESSON TITLE

AUTHORIZING OFFICIAL RESPONSIBILITIES

SUMMARY

This lesson will provide information on the responsibilities of an Authorizing Official (AO) IAW the Joint Federal Travel Regulations (JFTR)/Joint Travel Regulations (JTR) as they pertain to the Defense Travel System-Limited.

DURATION

1.0 Hour

TOPICS

TOPIC TITLE

Authorizing Official (AO) Responsibilities

OBJECTIVES

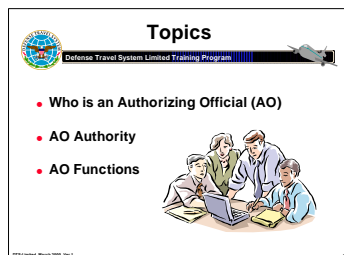
At the end of this lesson, participants will have a better understanding of:

1. Who is an AO
 2. What authority do AOs have
 3. What functions do AOs perform for their organizations
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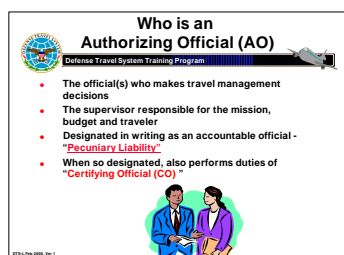
MATERIALS

Instructor Guide, Briefing Material, Participant Guide

Lesson 3: Authorizing Official (AO) Responsibilities



Slide 2



Slide 3

NOTE: In case questioned, definitions of pecuniary liability are included and can be read/discussed.

TOPICS

These are the topics that we will discuss during this lesson on the roles and responsibilities of an Authorizing Official (AO). As we have previously discussed, it is not the intention of the Defense Travel System-Limited to require an AO to become a travel expert. The vast majority of all decisions required by an AO concerning travel will be made for them through the edit checks built into the DTS-Limited software.

The AO will be prompted for decisions as they pertain to exceptions to approved DoD travel regulations. Although the majority of decisions will be made for the AO, it is still important that you, the AO, have a good understanding of the responsibilities you now have assumed with the implementation of the new Defense Travel System, the policies and procedures that govern those responsibilities and where to go should you have questions.

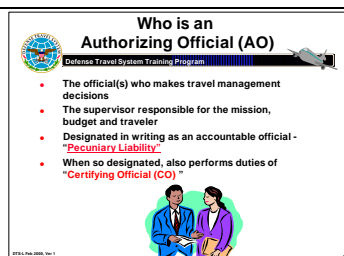
WHO IS AN AUTHORIZING OFFICIAL (AO)?

Travel management decisions should be made by the person who is in the best position to make them, the commander or supervisor responsible for the mission, the travel budget and the traveler.

Just as with full DTS, under DTS-Limited, the AO is the person, designated in writing as an accountable official, who holds the responsibility to authorize the expenditure of funds for the purpose of conducting official TDY travel and for reimbursing travelers for their legitimate expenses incurred incident to travel. The AO determines the necessity of a trip, funds availability and assignment of the proper line of accounting. The AO also approves travel claims for validity after completion of travel. As an accountable official, an AO may be held pecuniarily liable for approving any false claims.

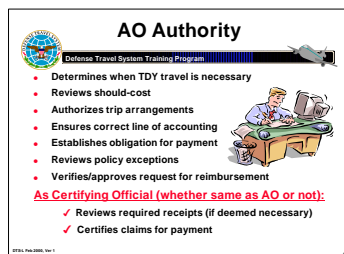
SEE NEXT PAGE FOR DEFINITION OF PECUNIARY LIABILITY

Lesson 3: Authorizing Official (AO) Responsibilities



Slide 3 (Con't)

NOTE: Any Service/Agency specific policies pertaining to AO/CO duties are the responsibility of the individual Service/Agency trainer.



Slide 4

PECUNIARY LIABILITY:

Accountable officials (i.e. authorizing officials) shall be pecuniarily liable for erroneous payments that result from information, data or service they negligently provide to a certifying officer. Pecuniary liability shall be for the full amount of the erroneous payment up to one month's compensation.

As a Certifying Official (CO), an AO, who has so been appointed in writing, is responsible for approving vouchers for payment. A certifying official may also be held pecuniarily liable for approving a false claim for payment.

A certifying official is pecuniarily liable for payments made IAW the provision of Chapter, 31 United States Code. The amount of liability is the amount of the erroneous payment reduced by any amount recovered from the recipient.

Certifying officers are not required to make good on payments they have certified if:

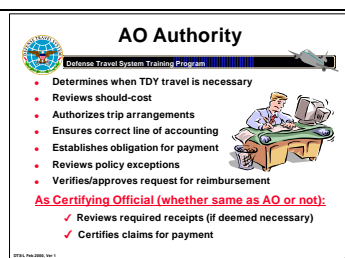
1. They made certifications based on official records.
2. They exercised due diligence and good judgment in performing their duties.
3. They had no personal knowledge of illegal, improper or incorrect payments and could not be expected to uncover them in the reasonable performance of their assigned duties.
4. The obligation was incurred in good faith.
5. No law specifically prohibited the payment.
6. The government received value for the payment.

WHAT AUTHORITY DOES THE AO HAVE?

AOs have now been given wide latitude in travel exception approval in the reengineered travel process. Reduced paperwork up and down the chain for exception approvals will be evident.

AOs are given broad decision authority in arrangement and expense decisions when travel situations fall outside the norm. This allows entitlements to be written for the norm versus the exception.

Lesson 3: Authorizing Official (AO) Responsibilities



Slice 4 (Con't)

NOTE: Lines of Accounting and how designated will be further discussed explained in CUI lessons that cover the DTA functions for these areas.

Even though AOs have vastly expanded responsibilities under the new entitlement system for approving arrangements and reimbursements, and are not expected to become travel experts, they are expected to know and understand the regulations and policies which govern them in performance of their duties.

AO responsibilities and authority under DTS-Limited are outlined in Appendix O of the Joint Federal Travel Regulations (JFTR)/Joint Travel Regulations (JTR) and in Volume 9 of the DOD Financial Management Regulation (FMR). Let's talk a bit more about some of those listed here.

As we have previously discussed, the first thing that the AO must do is to determine that the TDY trip is mission essential.

Once the AO tells the traveler of their mission, they must review the travel authorization (TA) to include the should cost and all arrangements which the traveler has submitted. The AO will rely on the edit and policy checks built into the DTS-Limited software in the review and authorization process for travel arrangements. The traveler's request, should cost and arrangements will be reviewed by the AO for consistency with DOD TDY travel policy, the JFTR/JTR and mission requirements.

AOs **CANNOT** authorize a trip if the should cost exceeds the amount of funds available in the AO's travel budget. If this case should arise, the AO must contact the appropriate funds control officer for further guidance.

The AO must ensure that the correct line of accounting has been applied to each trip request.

All items the DTS-Limited software identifies as policy exceptions must be reviewed by the AO on an individual basis. AOs must exercise discretion consistent with mission requirements and the JTR/JFTR, as applicable, in approving or denying items that are identified as exceptions to policy.

The AO's written authorization of the traveler's request, in addition to authorizing travel and establishing the traveler's entitlements, also establishes an obligation for future payment of travel expenses that may be incurred on the trip.

Lesson 3: Authorizing Official (AO) Responsibilities

AO Authority

Defense Travel System Training Program

- Determines when TDY travel is necessary
- Reviews should-cost
- Authorizes trip arrangements
- Ensures correct line of accounting
- Establishes obligation for payment
- Reviews policy exceptions
- Verifies/approves request for reimbursement

As Certifying Official (whether same as AO or not):

- ✓ Reviews required receipts (if deemed necessary)
- ✓ Certifies claims for payment

DTS-Limited, March 2000, Ver 1

Slide 4 (Con't)

Self-Authorizing Official

Defense Travel System Limited Training Program

- NO BLANKET TRAVEL ORDERS WITH DTS-LIMITED
- Some AOs designated, in writing, as "Self-Authorizing Official"
- May approve their own travel authorization
- **CANNOT** certify their own travel voucher
- Designation IAW Service/Agency policies and procedures

DTS-Limited, March 2000, Ver 1

Slide 5

How the AO Exercises Authority

Defense Travel System Training Program

AO AUTHORIZES/APPROVES:

- Standard government arrangements
- Alternative arrangements based on mission requirements, cost considerations and traveler preferences, if appropriate
- Excess trip expenses over and above standard arrangements that are appropriate to accomplish the mission

EXPENSE REPORT

Slide 6

NOTE: AO authorizes travel and approves expenses upon return.

In their role of Certifying Official (CO), the CO is responsible, once the travel has been completed, for certifying the reasonableness and validity of the travel claim for payment. To properly determine this, the CO must compare the should cost for each item claimed with the traveler's actual post-trip expense claims and, if they deem it to be necessary, review lodging receipts and receipts for individual expenses of \$75.00 or more.

Again, if the amount of the certified claim exceeds the amount of funds available in the budget, additional funding must be obtained from the appropriate funds control officer prior to certification.

SELF AUTHORIZING OFFICIAL

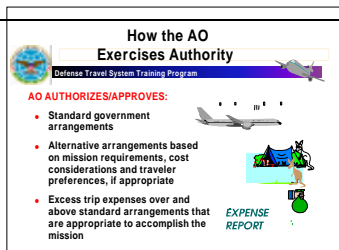
Under DTS-Limited, there will be no "Blanket Travel Orders." Instead, individuals who would have traveled under blanket travel orders will be designated "self-authorizing officials." They will act as their own AOs, possibly with their own budgets, and will approve their own travel authorization and verify funds availability from their budget allocation.

Although these officials are given autonomy for approving their own travel arrangements, they **CANNOT** certify their own travel vouchers. Thus, although the procedures for self-authorizing officials differ from blanket travel orders, the results and internal controls remain in place. Self-authorizing officials will be designated in accordance with Service/Agency policies and procedures.

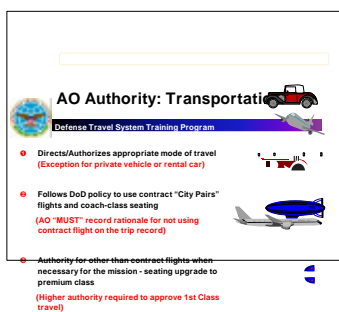
HOW DOES THE AO EXERCISE APPROVAL AUTHORITY?

The AO typically authorizes the standard government arrangements as reflected on the trip request (**travel authorization = trip request**), but has wide latitude to make changes. The trip request provides an initial estimate (should-cost) which reflects the known travel costs based on transportation, lodging, and rental car reservations, as applicable.

Lesson 3: Authorizing Official (AO) Responsibilities



Slide 6 (Con't)



Slide 7
(Bullet numbers correspond with numbers at left)

The AO reviews any other alternatives, and also decides whether available government lodging and mess must be used, authorizes higher per diem rates where appropriate, and determines if traveler initiated options will be allowed. This trip request then becomes the travel authorization. As we have previously discussed, once approved by the AO, the travel authorization provides the data for obligation of funds.

Upon the completion of travel, the traveler updates their travel authorization, by using the DTS-Limited software, to record actual costs and itemizes any other reimbursable expenses. The traveler then provides the updated travel voucher to the AO for approval of these expenses and the voucher now becomes the trip record or source document for payment.

WHAT CAN THE AO DO FOR TRANSPORTATION?

The AO may direct/authorize any mode of travel; air (commercial or military contract (Cat B)), bus, train, etc.) except may not "direct" travel by personal vehicle or rental car. If the traveler agrees to travel by personal or rental vehicle, the AO can authorize either of those modes. AOs cannot direct one mode and authorize another.

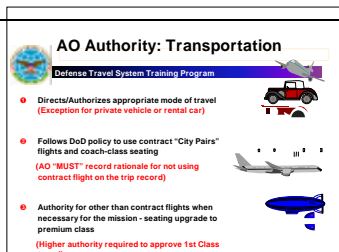
THERE IS A DIFFERENCE BETWEEN DIRECTING A MODE OF TRAVEL AND AUTHORIZING A MODE OF TRAVEL. MAKE SURE AOs KNOW WHAT THE DIFFERENCE IS AND THEIR RESPONSIBILITIES ARE.

DIRECT=MUST

AUTHORIZE=MAY

For air travel, coach class commercial air is the standard using contract city-pairs. If there is no city pair rate available, then the AO approves the most economical plane fare. The DTS-Limited software and commercial travel office (CTO) will provide information on these fares, but in general their use should be governed by the traveler's schedule and the overall cost of the travel and not by the traveler's preference of airlines.

Lesson 3: Authorizing Official (AO) Responsibilities

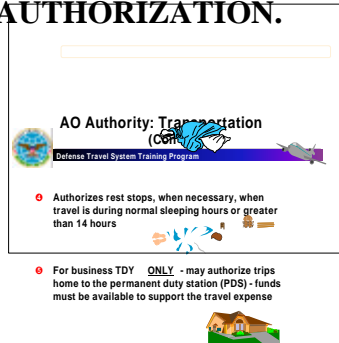


Slide 7 (Con't)

NOTE: EMPHASIZE THAT IF CONTRACT FLIGHT IS NOT USED, AO MUST LIST REASONS ON THE TRAVEL AUTHORIZATION.

SPECIFIC REASONS FOR NON-USE LISTED IN APPENDIX O.

AO NEEDS TO BE FAMILIAR WITH AND APPROPRIATELY ANNOTATE TRAVEL AUTHORIZATION.



Slide 8

(Slide bullet numbers correspond with numbers at left)

(CONTRACT CITY-PAIRS HAS BEEN PREVIOUSLY DISCUSSED BUT NOW IS A GOOD TIME TO AGAIN REFRESH STUDENTS ON CONTRACT CITY-PAIRS AND THEIR USE. NEED TO ALSO EMPHASIZE TO AOs THE IMPORTANCE OF USING CITY-PAIRS WHEN APPROVING TRAVEL. USE OF CITY PAIRS WILL ALWAYS BE FIRST CHOICE UNLESS MISSION REQUIREMENTS PRECLUDE. AO MUST JUSTIFY NON USE OF CITY-PAIRS IN THE TRAVEL AUTHORIZATION)

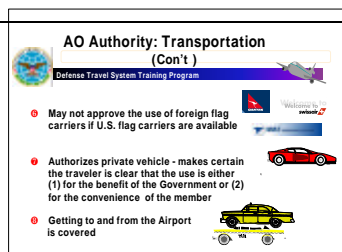
The AO can approve upgrades to premium class accommodations if the mission calls for it. The AO, however, may never approve first class travel. AOs must contact their Service headquarters, through command channels, for permission to use first-class accommodations.

SCRIPT FOR SLIDE 8

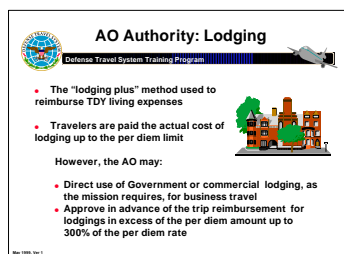
4. Rest stops may be approved by the AO for travel of up to 24 hours enroute if the travel is during normal sleeping hours or the scheduled trip from origin to destination exceeds 14 hours, including plane changes, etc.

5. AOs may permit any traveler to return home at government expense during and as part of a BUSINESS TDY if the TDY is of sufficient length to justify (normally 3 weeks in length). It is up to the AO to determine that the costs of this periodic return travel are outweighed by the savings and that travel funds are available. A cost analysis must be performed.

Lesson 3: Authorizing Official (AO) Responsibilities



Slide 9
(Slide bullet numbers
correspond with
numbers at left)



Slide 10

NOTE: If “more” than 300% is required to cover AEA, request must be approved by Per Diem Committee, in advance, and is only applicable for military traveling OCONUS.

SCRIPT FOR SLIDE 9

The AO cannot authorize use of a foreign flag carrier if a U.S. Carrier is available. Personal desires of the traveler have no bearing on this.

If the AO authorizes use of a private vehicle for TDY travel, the AO ensures that the travel authorization shows privately owned conveyance (POC) use is for the benefit of the Government, or the convenience of the traveler. If the POC use is for the Government benefit, the AO pays for the miles and the traveler gets the full number of travel days based on 400 miles per day. If the POC use is for the traveler's convenience, mileage is paid but the payment is capped by what the standard commercial transportation would have cost and the traveler gets paid for only one travel day.

Getting to and from the airports is still covered. The rule here is that the taxi fare between airport and home/work/TDY site, as appropriate, is the standard for reimbursing long term parking fees at the airport. Expenses claimed in excess of this standard are subject to question by the AO when approving the final claim.

WHAT CAN THE AO DO FOR LODGING?

The “lodging plus” method is used to reimburse the traveler for TDY living expenses. If government quarters aren't available, the AO may approve reimbursement for the actual cost of lodging, based on the single occupant rate, up to the maximum for the TDY site or stopover point. If the only lodging that is available costs more than the published maximum rate, the AO may authorize the higher amount such that the lodging cost and the M&IE don't exceed 300% of the published rate (lodging plus M&IE) to cover the cost of lodging.

If the higher lodging costs aren't known until after the travel is complete, the AO can still approve the higher reimbursement, but remember those higher costs are coming out of the AO's budgeted dollars. So it is up to the AO to make it clear that the traveler must make every effort to stay within the lodging per diem rate for his or her travel area.

Lesson 3: Authorizing Official (AO) Responsibilities


AO Authority: Lodging

Defense Travel System Training Program

- The "lodging plus" method used to reimburse TDY living expenses
- Travelers are paid the actual cost of lodging up to the per diem limit

However, the AO may:

- Direct use of Government or commercial lodging, as the mission requires, for business travel
- Approve in advance of the trip reimbursement for lodgings in excess of the per diem amount up to 300% of the per diem rate




Slide 10 (Con't)

AO Authority: Lodging (Con't)

Defense Travel System Training Program

- At schoolhouse sites, the commanding officer determines if use of Government quarters is appropriate
- Will not approve lodging reimbursement for staying with family or friends
- See the JFTR/JTR for deployment, or TDY aboard ships




Slide 11

AO Authority: Meals

Defense Travel System Training Program

The Traveler is paid a set amount for meals; HOWEVER, the AO may:

- Direct the Government meal rate (ONLY IF QUARTERS ARE AVAILABLE AND MESS IS AVAILABLE ON THAT INSTALLATION)
- Approve payment of full M&IE if use of government meal rate is directed but not available
- Reduce M&IE from full to proportional for meals provided



Slide 12

The AO makes the call on what lodging the traveler uses on business trips. However, even if the mission calls for use of on-base quarters, the AO may approve off-base quarters. AOs can even control what off-base lodgings are used. The DTS-Limited software or CTO will provide information and any choices that the traveler may want to consider.

NOTE: A new per diem rate for Conference fees allows up to 125% of the authorized lodging rate. This is for conferences only and should not be confused with the 300% rule. Questions regarding use of and approval of this per diem rate should be addressed through your Defense Travel Administration (DTA).

SCRIPT FOR SLIDE 11

If the AO sends a traveler to a school, the commander at the schoolhouse site makes the call on the use of Government quarters.

A REMINDER ON STAYING WITH FRIENDS OR RELATIVES - NO LODGING REIMBURSEMENT IS AUTHORIZED.

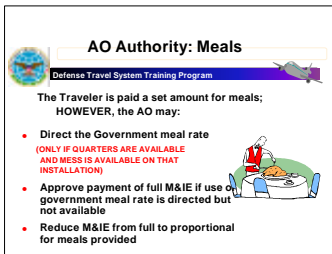
Appendix O of the JFTR/JTR contains detailed information on how lodging for group travel, deployments and TDY aboard ship is handled. This type of travel, however, may not be processed using DTS-Limited.

WHAT CAN THE AO DO FOR MEALS?

While the AO may require the use of adequate government quarters and mess during temporary duty travel if the mission calls for their use, the typical business trip envisions the traveler staying and eating off base. In this case, normal per diem rates apply and the AO only ensures the selected lodging (and cost) is appropriate, and that the costs are covered by the per diem lodging rate.

If on-base quarters are available to the traveler, and a government mess is also available on the same installation, the AO may direct the government mess rate for all or some meals (proportional rate).

Lesson 3: Authorizing Official (AO) Responsibilities



AO Authority: Meals
Defense Travel System Training Program

The Traveler is paid a set amount for meals; HOWEVER, the AO may:

- Direct the Government meal rate
(ONLY IF QUARTERS ARE AVAILABLE AND MESS IS AVAILABLE ON THAT INSTALLATION)
- Approve payment of full M&IE if use of government meal rate is directed but not available
- Reduce M&IE from full to proportional for meals provided

Slide 12 (Con't)

NOTE: Just because the government mess rate was prescribed does not prohibit the traveler from eating somewhere other than the government mess facility. It does effect the traveler's entitlements for reimbursement at only the prescribed rate.



AO Authority Reimbursable Expenses
Defense Travel System Training Program

Traveler will be reimbursed, with AO approval, for other necessary travel-related expenses such as:

- All applicable lodging taxes
- ATM fees (government travel card only)
- Traveler's check fees
- Telephone calls home (AO must limit to a \$\$\$ amount)
- Currency conversion fees

MUST BE TRAVEL RELATED TO BE REIMBURSABLE

Slide 13

IF GOVERNMENT QUARTERS ON-BASE ARE NOT AVAILABLE TO THE TRAVELER THE AO CANNOT DIRECT USE OF THE ON-BASE MESS RATE.

The AO has the option of not directing use of an on-base available Government mess thereby enabling the traveler to receive the full off-base per diem M&IE rate. If the mess is not available to the traveler, the AO has no choice but to provide the off base M&IE rate.

ALL THREE MEALS MUST BE AVAILABLE on a given day for the mess to be considered available for that day. The existing rule about receipt of a meal at no cost or a meal otherwise paid for by the Government remains in effect. Any traveler who has meals paid for as part of a registration fee or otherwise provided at no cost (except meals on planes and from friends or relatives) must report it and have the per diem reduced.

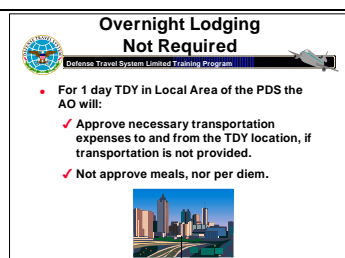
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There are many possible "miscellaneous" expenses, too many to list here. The AO will determine whether the miscellaneous expenses are related to travel or to something else and are reimbursable outside of the fixed M&IE rate.

All applicable lodging taxes are now a reimbursable expense. The cost of rental cars - when needed - are reimbursed along with the cost for fuel. Miscellaneous expenses like fees for ATM withdrawals, currency exchange commissions overseas (gains or losses are the traveler's responsibility), traveler check fees, and telephone calls home (AO must limit to a dollar amount) are reimbursable.

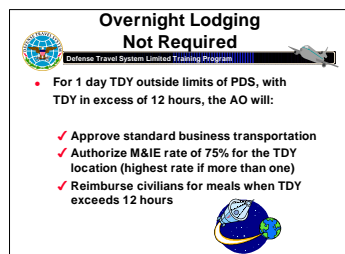
Expenses not directly related to travel, such as equipment or uniforms, are generally not allowed as travel reimbursable expenses.

Lesson 3: Authorizing Official (AO) Responsibilities



Slide 14

(See JFTR/JTR, Chapter 3, Chapter 2, and Appendix A in each, for definition(s) of local area (Chap. 3 or 2) and PDS (A). A copy of both is included at the end of script for instructor use. Additional Command information should be discussed at this time)



Slide 15

WHAT CAN THE AO DO FOR 1-DAY TDY WHEN LODGING IS NOT REQUIRED?

For travel in the local area of the Permanent Duty Station (PDS), the rules and reimbursements have not changed under the simplified entitlements, except that when a traveler uses a personal vehicle, the amount the AO authorizes is what the traveler incurs above the normal commuting costs. If the traveler normally uses the vehicle to get to work, the normal commuting distance is subtracted out and the mileage for the additional distance is payable.

When public or commercial transportation is used, the total costs are reimbursable. The law continues to prohibit reimbursement for meals at the permanent station, and per diem is prohibited except when an emergency exists which threatens human life or loss of government property, or for members escorting arms control inspection teams.

The AO is prohibited from approving per diem except "in emergency circumstances that threaten injury to human life or damage to government property." The travel authorization must document the reasons.

SCRIPT FOR SLIDE 15

The AO may also authorize travel outside the area of your PDS and not require lodging. For example, the traveler could take a short business trip from Washington, DC, to Chicago, leaving on a flight in the morning and returning late that evening.

For transportation, normal business standards apply. For travel outside the PDS limits, when the travel is more than 12 hours, reimbursement for meals is 75% of the M&IE rate for the TDY location (highest rate if more than one). While no per diem is authorized when TDY is 12 hours or less, the AO will authorize the actual amount paid up to the proportional meal rate (minus the IE portion) for the TDY location when uniformed travelers (does not apply to civilians) spend more than the cost of normal meal arrangement for travel outside the PDS limits.

Lesson 3: Authorizing Official (AO) Responsibilities



After the TDY Travel
Defense Travel System Training Program

Authorizing Official **MUST**:

- Confirm that the travel occurred
- Ensure validity of claimed expenses
- Approve or disapprove traveler's exceptions
- Ensure traveler knows to retain required receipts (lodging receipt and any receipt \$75.00 or more) for a period of 6 years, 3 months
- If also the **Certifying Official**, verify required receipts (if deemed necessary) and certify the claim for payment

Slide 16

WHAT DOES THE AO AND/OR THE CO NEED TO APPROVE TRAVEL EXPENSES AND CERTIFY CLAIM FOR PAYMENT?

Upon completion of TDY, the traveler, by use of the DTS-Limited software, will provide the AO a travel voucher which reflects actual costs of transportation, lodging, rental car, and other incurred travel related expenses. The AO will make a determination of any exceptions to use of transportation, lodging, meals and other expenses over and above the original should-cost that were previously authorized. The AO determines if these expenses were necessary and then either approves them as appropriate to the mission, or denies them.

In their role as CO, they may request the traveler, if deemed necessary, provide receipts (any lodging receipt or expense claimed of \$75.00 or more) as part of their updated travel authorization. Once approved and certified for payment by the CO, the travel voucher is now ready for further processing and submission for payment.

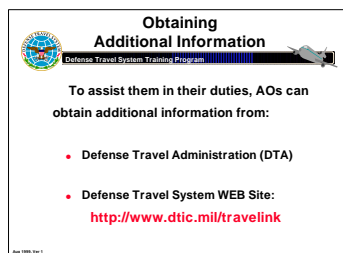
AO MUST ENSURE THAT TRAVELER KNOWS TO RETAIN RECEIPTS FOR 6 YEARS, 3 MONTHS

WHERE TO GO FOR ADDITIONAL INFORMATION?

If the AO needs additional information in order to reach a decision on the should-cost, funds availability or the final expense report they must first contact the appropriate member of their Defense Travel Administration (DTA) for assistance. The DTA is the first stop for the AO if any problems arise with a travel request or claim.

If the DTA is unable to resolve the problem, it may need to be referred by the DTA to the specific Service/Agency Defense Travel System travel POC for assistance.

There is also a DTS-Limited WEB site containing links to various travel-related regulations and publications that may be used by the AO for obtaining additional information.



Obtaining Additional Information
Defense Travel System Training Program

To assist them in their duties, AOs can obtain additional information from:

- Defense Travel Administration (DTA)
- Defense Travel System WEB Site:
<http://www.dtic.mil/travelink>

Slide 17

Lesson 3: Authorizing Official (AO) Responsibilities

Summary

Defense Travel System Training Program

- Broad approval authority
- Be familiar with rules and regulations
- Know where to go for assistance

TRUST YOUR TRAVELERS

DTS Limited, April 2000, Ver 1

Slide 18

SUMMARY

We've covered a lot of information in this lesson so let's take a moment to cover some of the key points:

As you have learned, AOs now have broad approval authority when it comes to approving travel and travel claims. This is one of the keys to making the Defense Travel System and DTS-Limited work – the powering down of travel related decisions to those who are in the best position to make them.

While the DTS-Limited software will be assisting the AO in making a lot of those decisions, as an AO, you still need to be familiar with the rules and regulations that apply to and govern how your organization administers travel. Some of these apply to all of DOD – others may be specific to your Service or Agency.

It's important that you not only are familiar with the rules for travel but you insure they are complied with as there are legal penalties that could be imposed on you should you knowingly violate any of these. As with rules and regulations, the DTS-Limited software will also provide you with on-line help should you have a problem. Never be afraid though to ask for assistance if you are not 100% sure of what you should/should not do concerning a travel request or claim.

Lastly, trust your travelers. They are honest and hard working and want to do the right thing when it comes to their travel responsibilities. They are to be treated as honest, responsible customers as long as they follow established travel rules. It will be your job as an AO to assist them in any way you can to make their job and yours a success.

QUESTIONS?

This concludes my presentation on Authorizing Official's duties and responsibilities.

DTS-Limited

Defense Travel System Limited Training Program

Questions?

DTS Limited, April 2000, Ver 1

Slide 18

Lesson 3: Authorizing Official (AO) Responsibilities

LOCAL AREA/PDS INFORMATION:

(below information is taken from Chapter 3, JFTR/JTR. Definition of PDS may be found in JFTR/JTR, Appendix A.)

Local Area.

The local area is the area:

1. Within the duty station limits (permanent or temporary) and the metropolitan area around that station which is ordinarily served by local common carriers; or
2. Within a local commuting area of the duty station, the boundaries of which are determined by the order-issuing official or as prescribed by local Service directives; or
3. Separate cities, towns, or installations adjacent, or close, to each other, between which the commuting public travels during normal business hours on a daily basis.

An arbitrary distance radius shall not be established to define a local commuting areas.
